

REBECCA L. MASTRANGELO, ESQ.
Nevada Bar No. 5417
ROGERS, MASTRANGELO, CARALHO & MITCHELL
700 South Third Street
Las Vegas, Nevada 89101
Telephone: (702) 383-3400
Facsimile: (702) 384-1460
rmastrangelo@rmcmlaw.com

SU-LYN COMBS (*PRO HAC VICE*)
TUCKER ELLIS LLP
515 South Flower Street
Forty-Second Floor
Los Angeles, CA 90071
Telephone: (213) 430-3400
Facsimile: (213) 430-3409
su-lyn.combs@tuckerellis.com

VASUDHSIRI SATHIENMARS (*PRO HAC VICE*)
TUCKER ELLIS LLP
201 Mission Street, Suite 2310
San Francisco, CA 94105
Telephone: (415) 617-2400
Facsimile: (415) 617-2409
vasudhsiri.sathienmars@tuckerellis.com

Attorneys for Defendant
OTIS ELEVATOR COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIA CHAIDEZ DE HERRERA,
individually,

Plaintiff,

v.

OTIS ELEVATOR COMPANY, a foreign
corporation; TK ELEVATOR
CORPORATION, a domestic corporation; TK
ELEVATOR CORPORATION, a foreign
corporation; TK ELEVATOR
MANUFACTURING, INC., a foreign
corporation; DOES 1 through 30, inclusive; and
ROE BUSINESS ENTITIES 4 through 30,
inclusive,

Defendants.

Case No. 2:24-cv-01122-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND REPLY DEADLINE
TO DEFENDANT OTIS
ELEVATOR COMPANY'S
MOTIONS**

IT IS HEREBY STIPULATED AND AGREED, by all parties, by and through their respective counsel of record, that the deadline for Defendant Otis Elevator Company to file a reply to Plaintiff's Response to Motion for Summary Judgment, currently due May 21, 2025, shall be extended to June 20, 2025.

Defendant Otis Elevator Company filed a Motion for Summary Judgment [Dkt. #40] on April 1, 2025. Plaintiff filed a Response to Defendant Otis Elevator Company's Motion for Summary Judgment on April 28, 2025 [Dkt. #43] and an Errata to Plaintiff's Response to Defendant Otis Elevator Company's Motion for Summary Judgment on April 30, 2025 [Dkt. #44].

Counsel for Plaintiff and Otis met and conferred and Plaintiff agreed to dismiss the non-product liability causes of action *only* against Otis pursuant to NRS 11.202. The only remaining claims are Plaintiff's product liability claims against Otis. Good cause exists for this request because the parties have scheduled an inspection of the Subject Elevator on May 21, 2025. The inspection will allow the parties to determine the cause of the alleged elevator malfunction and determine whether the product liability claims should remain against Otis. Extending the deadlines will allow the parties to complete the necessary discovery for the summary judgment motion and ensure that the Court has the full context to make an informed decision.

This requested extension is made in good faith and not for the purposes of delay.

Respectfully Submitted By:
TUCKER ELLIS, LLP

/s/ Su-Lyn Combs

SU-LYN COMBS, ESQ.
VASUDHSIRI T. SATHIENMARS, ESQ.
TUCKER ELLIS LLP
515 South Flowers Street, 42nd Floor
Los Angeles, CA 90071

Attorneys for Defendant Otis Elevator Co.

Respectfully Submitted By:
BERTOLD CARTER SMITH & CULLEN

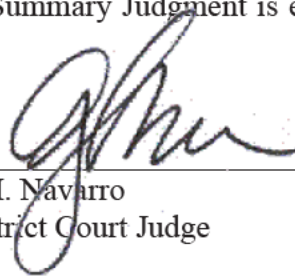
/s/ Paul R.M. Cullen

PAUL R.M. CULLEN ESQ.
Nevada Bar No. 12355
7405 West Sahara Avenue
Las Vegas, NV 89117

Attorneys for Plaintiff

ORDER

Based on the parties' stipulation ECF No. 45 and good cause appearing, IT IS ORDERED that the deadline to reply to Plaintiff's Response to Motion for Summary Judgment is extended to June 20, 2025.



Gloria M. Navarro
U.S. District Court Judge

Dated: May 5, 2025.

CERTIFICATE OF SERVICE

I certify that on the 5th day of May, 2025, the foregoing was served upon the following counsel of record via electronic mail:

Paul R.M. Cullen, Esq. Lindsay Cullen, Esq. BERTOLDO CARTER SMITH & CULLEN 7408 W. Sahara Avenue Las Vegas, NV 89117 Tel.: (702) 228-2600 Fax: (702) 228-2333 Email: paul@nvlegaljustice.com lindsay@nvlegaljustice.com <i>Attorneys for Plaintiff</i>	Pamela A. McKay, Esq. MCKAY LAW FIRM, CHTD. 8440 W. Lake Mead Blvd., Ste. 112 Las Vegas, Nevada 89128 Tel.: (702) 835-6956 Fax: (702) 835-6957 Email: pmckay@mckaylawfirmchtd.com <i>Attorneys for Defendant TK Elevator Corporation, TK Elevator Corporation, and TK Elevator Manufacturing, Inc.</i>
Rebecca L. Mastrangelo, Esq. Nevada Bar No. 5417 ROGERS, MASTRANGELO, CARVALHO & MITCHELL 700 South Third Street Las Vegas, Nevada 89101 Tel.: (702) 383-3400 Fax (702) 384-1460 Email: rmastrangelo@rmcmlaw.com <i>Attorneys for Defendant Otis Elevator Company</i>	Bradley J. Johnston, Esq. (Pro Hac Vice) The Cavanagh Law Firm, P.A. 1850 N. Central Ave., Ste. 1900 Phoenix, AZ 85004 Tel.: (602) 322-4000 Fax: (602) 322-4100 Email: bjohnston@cavanaghlaw.com <i>Attorneys for Defendant TK Elevator Corporation, TK Elevator Corporation, and TK Elevator Manufacturing, Inc.</i>

/s/: Stella S. Villegas

An employee of Tucker Ellis LLP